

Deverie J. Christensen
Nevada State Bar No. 6596
Hilary A. Williams
Nevada State Bar No. 14645
JACKSON LEWIS P.C.
300 S. Fourth St., Suite 900
Las Vegas, Nevada 89101
Tel: (702) 921-2460
Email: deverie.christensen@jacksonlewis.com
hilary.williams@jacksonlewis.com

*Attorney for Defendants
Optum Services, Inc. d/b/a Southwest
Medical Pharmacy and United Health Group NV Corp.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

PATRICK GREGORY OSAN, an individual,

Plaintiff,

vs.

OPTUM SERVICES, INC. d/b/a Southwest
Medical Pharmacy; UNITED HEALTH GROUP
NV CORP; EMPLOYEE(S) / AGENT(S) DOES
1-10; and ROE CORPORATIONS 11-20,
inclusive,

Defendants.

Case No. 2:22-cv-00137-JCM-VCF

**STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANTS
TO RESPOND TO PLAINTIFFS'
AMENDED COMPLAINT AND FILE A
JOINT CASE CONFERENCE REPORT
(FIRST REQUEST)**

IT IS HEREBY STIPULATED by and between Plaintiff Patrick Gregory Osan ("Plaintiff"), through his counsel, Jeffrey Gronich, Esq., and Defendants Optum Services, Inc. d/b/a Southwest Medical Pharmacy and United Health Group NV Corp. ("Defendants"), through their counsel Jackson Lewis P.C., that: (1) Defendants shall have an extension up to and including March 24, 2022 in which to file their respective responses to Plaintiff's Amended Complaint (ECF No. 14); (2) the Parties shall have an extension in which to file a report in compliance with Fed. R. Civ. P. 26(f) ("FRCP 26(f)") up to and including March 23, 2022; and (3) the Parties shall have an extension of time to exchange their initial disclosures up to and including March 23, 2022. This Stipulation is submitted and based upon the following:

1. In anticipation of exchanging initial disclosures, the Parties discovered that they had

1 entered into an arbitration agreement. The Parties are determining whether they will stipulate to
2 stay the case pending arbitration, whether Defendants will move to compel arbitration, or whether
3 they can settle before such filings are necessary.

4 2. To avoid imposing on the Court's time and resources by filing documents that the
5 Parties believe will be rendered unnecessary, the Parties respectfully request a two-week extension
6 in which Defendants may file their responses to the Amended Complaint (ECF No. 14), the Parties
7 may file their FRCP 26(f) report, and the Parties may exchange initial disclosures.

8 3. Defendants' respective responses to the Amended Complaint (ECF No. 14) are
9 currently due on March 10, 2022.

10 4. The Parties respectfully request that the Defendants' deadline to file responses to
11 the Amended Complaint (ECF No. 14) be extended to March 24, 2022.

12 5. This is the first request for an extension of time for Defendants to file their respective
13 responses to Plaintiff's Amended Complaint (ECF No. 14).

14 6. In addition, The Parties held a conference pursuant to FRCP 26(f) on February 23,
15 2022. Thus, the current deadline to provide a report consistent with the rule and to exchange initial
16 disclosures is March 9, 2022.

17 7. The Parties respectfully request that their deadline to file an FRCP 26(f) report and
18 to exchange initial disclosures be extended to March 23, 2022.

19 8. This is the first request for an extension of time for the Parties to file the FRCP 26(f)
20 report and to exchange initial disclosures.

21 9. This request is made in good faith and not for the purpose of delay.

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10. Nothing in this Stipulation, nor the fact of entering to the same, shall have the effect of or be construed as waiving any claim or defense held by any party hereto.

Dated this 9th day of March, 2022.

JEFFREY GRONICH, ATTORNEY AT
LAW, P.C.

JACKSON LEWIS P.C.

/s/ Jeffrey Gronich
JEFFREY GRONICH, ESQ.
Nevada Bar No. 13136
1810 E. Sahara Ave, Suite 109
Las Vegas, Nevada 89104

*Attorney for Plaintiff
Patrick Gregory Osan*

/s/ Hilary A. Williams
DEVERIE J. CHRISTENSEN, ESQ.
Nevada Bar No. 6596
HILARY A. WILLIAMS
Nevada Bar No. 14645
300 South Fourth Street, Suite 900
Las Vegas, Nevada 89101

*Attorneys for Defendants Optum Services,
Inc. d/b/a Southwest Medical Pharmacy and
United Health Group NV Corp.*

ORDER

IT IS SO ORDERED:



United States Magistrate Judge

Dated: 3-15-2022

4880-3218-8436, v. 1